

# EXHIBIT B

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May 24, 2010

**VIA CERTIFIED MAIL**

Amcore Financial, Inc.  
501 7<sup>th</sup> Street  
Rockford, IL 61104-1242

**Re: *Kretsinger, et al. v. Amcore Financial, Inc., et al.***  
**U.S.D.C. for the Northern District of Illinois**  
**Western Division**  
**Case No.: 3:10-cv-50132**

Dear Sir or Madam:

As you may be aware, pursuant to FED. R. CIV. P. 26, potentially all electronically stored data is discoverable. This includes relevant e-mails sent or received by any employee, other information stored on servers, or information stored on backup tapes or other media that are capable of restoration, even if the information was deleted at some prior time.

Accordingly, Plaintiff in the above-captioned matter formally requests that, during the pendency of this litigation, Amcore Financial, Inc., as well as its subsidiaries, officers, agents, employees or other third party custodians (together, "Amcore"), preserve all accessible or inaccessible information, documents, as defined in FED. R. CIV. P. 34(a), and other tangible objects in their custody or control which are potentially relevant to this matter (together, "documents").

All documents should be maintained in their original tangible or electronic formats, including native file formats and associated metadata, without alteration, transfer or destruction. Specifically, Plaintiff requests that all routine destruction of electronically stored information ("ESI"), including but not limited to periodic purges of e-mail or e-mail accounts and destruction or overwriting of back-up data, cease during the pendency of this litigation or until all documents, including native file formats and associated metadata, can be copied and preserved as a complete and forensically verified copy of the files on CD/DVD-ROM, external hard drive,

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or other sustainable media. If potentially relevant ESI or other documents are currently held or managed by a third party on behalf of Amcore, the third party shall be instructed to maintain and preserve that data in accordance with this request. Third parties include, but are not limited to: Outside Counsel, Accountants, Data/Application Service or Storage Providers, Consultants, and Contractors.

Documents that should be maintained in an electronic format, as described above, include but are not limited to the following:

1. Writings created using word-processing applications, such as Microsoft Word, Word Perfect, Adobe Acrobat, or other proprietary or open-source applications;
2. Charts, graphs and presentations created using graphic and spreadsheet applications such as Microsoft Excel, Microsoft PowerPoint, Desktop Publisher, Adobe Acrobat, or other proprietary or open-source applications;
3. Portals and web pages – active or archived – created and hosted on intranet, internet, portals, or other broadcast and hosting systems;
4. Images and graphics created using electronic imaging devices, such as digital still or video cameras, scanners, or graphic applications;
5. Databases and other data compilations, including information related to network activity and management (including server logs and Internet usage); and
6. Messaging, both written and verbal, including e-mails, instant messaging, voice mails, or other communication systems/methods.

In addition, Plaintiff seeks preservation of certain tangible objects, including the following:

1. Data back-up systems, including tapes, CD/DVD-ROM, or internal and external hard drives;
2. Network servers, including e-mail servers;
3. Voicemail systems;
4. Shared network hard drives or storage devices;
5. Individual storage drives on desktop or laptop computers (these drives include but are not limited to internal, external, and flash/thumb drives);
6. Personal data devices such as portable data devices, Personal Data Assistants, iPods, iPhones, BlackBerrys and other Smartphones/handheld computers;

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7. Electronic cameras; and
8. Cell Phones.

All tangible objects should be maintained in their original condition.

We ask that Amcore provide confirmation that the above-described documents and tangible objects have been and will continue to be preserved during the pendency of the litigation as is required by FED. R. CIV. P. 34. Please feel free to contact me should you wish to discuss these issues in further detail.

Sincerely,

A handwritten signature in black ink, appearing to be "E. Ciolko", with a long, sweeping horizontal line extending to the right.

Edward W. Ciolko

EWC/jsj